Radon Stakeholders Consensus Building Dialogue
Taking Stock of Progress, Engaging Key Issues
February 14, 2008 12:00 – 3:00 pm EST

Participants:

USEPA:
Tom Kelly, Director, Indoor Environments, USEPA
Bill Long, Director, CRAT, USEPA
Susie Shimek, Radon Team Leader, USEPA
Phil Jalbert, Radon Team Leader, USEPA
Larainne Koehler, Radon & Indoor Air Coordinator for EPA, Region 2
Emilio Bragaza, Director, Center for Indoor Environments, EPA

State Radon Programs:
Chrystine Kelley, State Radon Contact, CO
Josh Kerber, State Radon Staff, OH
Jim McNees, State Radon Contact, AL; member, E-25 and CRCPD Board of Directors
Sara Morgan, State Radon Staff, NE; member, E-25
Bob Stilwell, State Radon Contact, ME; member E-25 and SR-R

National Environmental Health Association – National Radon Proficiency Program (NEHA-NRPP)
Heidi Shaw, Credentialing Coordinator, NEHA
Dick Manning, Chair of Policy Advisory Board, NEHA-NRPP
Angel Price, Executive Director, NEHA-NRPP

Conference of Radiation Control Program Directors (CRCPD)
Curt Hopkins, Radon Program Manager, CRCPD

AARST Consortium on National Radon Standards
Gary Hodgden, Executive Stakeholder Committee Chairman, AARST Standards Consortium

American Association of Radon Scientists and Technologists (AARST):
Bill Angell, Professor & Director, University of Minnesota—Midwest Universities Radon Consortium; President, AARST
Peter Hendrick, Executive Director, AARST
Philip Jenkins, Ph.D., CHP, Bowser Morner Laboratories

ASTM
Steve Mawn, ASTM

Introductions and Welcome: EPA and facilitator welcomed everyone to the call, and all participants introduced themselves, so all would know who was present. The facilitator reviewed the agenda, and swiftly moved to the first item of business.

Progress and Next Steps on Dialogue Group Commitments

Work group on lab referencing AND Increasing QA / QC for accuracy of devices.

On behalf of the Lab Referencing Work Group, Phil Jenkins presented a summary of a draft paper identifying the current status and the needs of the Radon community regarding reference system for Radon in the United States. The presentation addressed International Intercomparisons, the US System of US Reference Facilities, Device Evaluations, Performance Testing, Calibrations and Spiking, and offered some recommendations for improving reliability and quality assurance for radon measurement. The presentation is attached.

(The Lab Referencing Work Group participants included Bill Long, Jim Burkhart, Phil Jalbert, Andy George, David Wilson, Greg Budd, Emilio Braganza, and Phil Jenkins.)

At the conclusion of the presentation, the group discussed their responses to the needs and vision described, and offered thoughts about options or proposals for implementing this vision.

It was noted that the need for EPA to begin intercomparing internationally should not be prohibitive in terms of resources, requiring staff from the Las Vegas lab to make intercomparison trips to Europe two times a year.

The Work Group's recommendations included the need to develop a number of consensus standards on radon measurement, including:

- intercomparison
- device evaluation
- performance testing
- calibration and spiking

Participants noted the time needs for developing all of these standards, and asked about other shorter-term options. The group noted that some protocols guiding these activities, such as guidance documents from NEHA-NRPP and existing intercomparison protocols, already existed, and could be / are being used in the short term.

A participant asked whether there were existing standards for these topics in Europe. Phil responded that there is currently work being done on an International standard on radon with 5 parts, but that it would not be finished anytime soon.

In terms of cost, it was suggested that once developed, the new standards would be adopted by the proficiency programs, who would charge fees to manufacturers and labs to cover the costs of increased QA/QC.

Commenters named the following priorities for lab referencing:

- Agreement on the minimum on quality assurance
- Creation of more demand for labs

There was a discussion on whether the goal should be to work for more State programs to require QA, or for proficiency programs to require and verify it.

The proficiency programs (according to the EPA QA protocols from 1997) require that labs do spiking, but they currently don't confirming whether labs/manufactures are doing it. It was suggested that the proficiency programs could require proof, but concerns were raised about the costs. It was suggested that device companies would pay for the costs of testing, (as they already should be), but who would pay for the cost of audits? One suggestion was that regulatory states who already require this can share their information with the proficiency programs.

Concerns were raised about Environmental Justice issues, if there were in increase in costs for professional services in rural or less concentrated areas. It was suggested that stronger requirements for testing professionals might create an increased cost barrier for rural areas, who have a lower concentration of providers. Increasing costs of certification may lead to less manufacturers seeking certification.. These costs would need to be built into the system. This topic requires more discussion from the group.

The group also began to clarify the distinction between QA for calibration and spiking. Participants said that calibration should be required, but that spiking is different. Most participants felt that both should be required.

The group clarified that the ultimate goal here is to get professionals and labs to do QA, and the question is what is the best way to do this.

A question was asked about how any agreements or recommendations from this group would be transferred to the proficiency programs, especially since only one proficiency program is represented here. Suggestions included:

- Seek voluntary agreement from both programs
- EPA seek to forward these recommendations within their capacities
- States with regulatory authority adopt recommendations
- Develop consensus standards

Responding to perceptions of conflict of interest between AARST and NEHA/NRPP

The group as a whole agreed that this issue had been adequately addressed by the answers, documents, and actions of AARST and NEHA/NRPP. Participants felt that the fact that so few responses were returned from the "Questions to States" survey was a sign that while it is very important to a very few people/States, it is not a significant issue for most.

Participants felt that the documented history from NEHA-NRPP that was circulated was helpful. There were some suggestions for improving that document, which Heidi will address after she returns from her maternity leave after March 3.

In the spirit of clarification and disclosure, AARST involved in promoting state policies and legislation around the country. Our model legislation equally reference NRSB and NEHA-NRPP to be considered as bona-fide programs.

All appropriate representatives present at the meeting (Steve Mawn from ASTM abstained) agreed to do the following:

1. speak as leaders to confirm lack of conflict of interest, continue to educate people in your sphere of influence
2. If you hear concerns, address them yourself, point them to other credible sources of information, direct them to those programs
3. keep a careful eye, and address any new concerns that arise immediately with the group and/or specific parties, and maintain on-going communication.

Reconciliation of differences and similarities between ASTM E-2121 and AARST's RMS

Gary Hodgden, with assistance and input from Steve Mawn, began with a presentation overviewing consensus standards and explaining the similarities and differences in processes for developing standards through ASTM, the AARST Standards Consortium, and ANSI. He suggested the goals of educating the radon community about processes, and clarifying misconceptions, and stressed the need for the involvement of all stakeholders in creation of standards. The presentation is attached.

Gary then reported on the progress made by the AARST Standards Consortium and ASTM in reconciling the ASTM E-2121 and the AARST Consortium RMS, which was begun by Gary and Phil Anthes immediately subsequent to the first formal convening of the stakeholder discussions in Las Vegas. (The cooperative effort towards RMS harmonization is actually a product of the stakeholder group initiative.) It was announced that Phil Anthes has resigned as chair of the Working Group for E-2121 effective in May.

The following Process Options were identified::

Option 1: revise E-2121 through ASTM 06 subcommittee within ASTM rules with new balanced co-chairs

- this would need to meet certain procedural requirements for transparency, participation, and balance, as identified by the Consortium and approved by other stakeholders;
- this could ideal link to ANSI, or just follow ANSI requirements

Option 2: revise Consortium RMS under Consortium and ANSI rules

Participants from AARST and the AARST Standards Consortium stated that their preference for Option one, if it was possible to achieve, and offered to withdraw the AARST standard if a better document and acceptable process exist.. All other participants agreed that this option was preferable, and all reiterated their strong support for one standard acceptable to all.

AARST stated that they would need to educate its constituents about this process and its viability, to address potential concerns among their members.

Participants asked some questions about the substantive issues at stake – that is, the list of 20 or so actual items of disagreement within the standards. The facilitator clarified that this presentation and discussion – that is, the current task of this Stakeholder Group - was to explore the procedural requirements for developing standards that would be acceptable to all parties in the radon community as Consensus Standards. The actual negotiations about those 20 items will need to take place utilizing such an agreed-upon process, which still needs further discussion from the group.

The group brainstormed the following Next Steps:

1. agree upon acceptable process / procedural issues for reconciling the documents
   - determine who co-chairs are
   - agree on process mechanisms that meet all concerns – (enumerate the necessary process mechanisms)
     - task group endorse ANSI process for 2121
2. begin to reconcile the 20 substantive/technical concerns of the document

There was a request to see an enumeration of the process concerns and requirements that the Consortium is recommending to meet their interests regarding transparency, participation, and decision-making.

Representatives were asked to consider whether they would be able to make the following agreement: IF they were able to agree upon the process for reconciling the standards, would they be willing and able to commit to support the final standard that emerged from that process? Participants need to confirm this with their constituents and be prepared to make a commitment at the next meeting.

On-going Standards Development: The group briefly clarified that, beyond the current over-lap of mitigation standards, there was a need to gain buy-in from all parties to one or more on-going standard development processes that avoid duplication, follow processes that are universally acceptable within the radon community, with credibility and acceptability by all who will use and rely on the standards, and meet unmet needs for new standards. This is a topic for further discussion at the next meeting.

The Consortium mentioned that it had developed a list of standards that needed to be developed, in priority order. This list was subsequently sent to the facilitator and is attached.

Updates on Other Action Items coming out of Jacksonville : The facilitator briefly mentioned a few additional items, including the revised Group Protocols that were sent around before the call. The facilitator also disclosed, as required by the group protocols, that she had worked with the EPA HQ radon team on harmonizing their presentations of the Radon Leaders Saving Lives campaign.

NEXT Meeting: It was announced that the next face-to-face meeting of the Radon Stakeholders Dialogue would take place on April 4, 2008 in Manchester, NH. EPA agreed to send out an official invitation to participants.